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IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF MULTNOMAH

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**PROVIDENCE HEALTH &**  
**SERVICES-OREGON**, an Oregon  
nonprofit corporation, dba Providence  
Portland Medical Center,

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Plaintiff,

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vs.

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**SANJANA PAHALAD MANCUSO**,  
personal representative of the Estate of  
Rattan Kumar Pahalad, in her official and  
personal capacities,

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Defendant.

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Pursuant to Oregon Evidence Code 201(b), ORS 40.065, Plaintiff Providence  
Health & Services - Oregon (“PH&S-O”), hereby requests that the Court take judicial  
notice of the date that defendant Sanjana Pahalad Mancuso (“Mancuso”) first published  
notice to interested persons in connection with her administration of the Estate of Rattan  
Kumar Pahalad (the “Estate”), as evidenced in the true and correct copy of the Notice of  
Publication filed by Mancuso in the probate court for Multnomah County, case no.  
16PB03421, on July 11, 2016, attached hereto as Exhibit 1.

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Case No. 16CV38474

**PLAINTIFF’S REQUEST FOR  
JUDICIAL NOTICE IN SUPPORT OF  
OPPOSITION TO DEFENDANT’S  
MOTION TO DISMISS PLAINTIFF’S  
SECOND CLAIM**

Page 1 – **PLAINTIFF’S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF  
OPPOSITION TO DEFENDANT’S MOTION TO DISMISS  
PLAINTIFF’S SECOND CLAIM**

HARRANG LONG GARY  
RUDNICK P.C.  
360 East 10th Avenue  
Suite 300  
Eugene, OR 97401-3273  
Phone 541-485-0220  
Fax 541-686-6564

1 427, 437, 89 P3d 1238, 1244 (2004) (affirming probate court's taking of judicial notice of  
2 entire court file of prior guardianship proceeding to establish necessary facts). The date  
3 that Mancuso first published notice to interested persons in connection with her  
4 administration of the Estate is contained within a document filed by Mancuso in the  
5 Multnomah County probate court, and is thus "[c]apable of accurate and ready  
6 determination by resort to sources whose accuracy cannot reasonably be questioned" as  
7 required by OEC Code 201(b). Judicial notice of this date is therefore proper.

8 DATED this 5<sup>th</sup> day of January, 2017.

9 HARRANG LONG GARY RUDNICK P.C.

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By: s/Lorelei A. Craig  
12 Lorelei A. Craig

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Page 2 – **PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF  
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## AFFIDAVIT OF PUBLICATION

DJC



921 S.W. Washington St. Suite 210 / Portland, OR 97205-2810  
(503) 226-1311

STATE OF OREGON, COUNTY OF MULTNOMAH--ss.

I, **Michelle Ropp**, being first duly sworn, depose and say that I am a **Principal Clerk of the Daily Journal of Commerce**, a newspaper of general circulation in the counties of CLACKAMAS, MULTNOMAH, and WASHINGTON as defined by ORS 193.010 and 193.020; published at Portland in the aforesaid County and State; that I know from my personal knowledge that the Probate notice described as

**Pahalad, Rattan Kumar**

**ESTATE OF RATTAN KUMAR PAHALAD CASE NUMBER: 16PB03421 NOTICE TO INTERESTED PERSONS**

**Notice: The Circuit Court of the State of Oregon, for the County of Multnomah has appointed the undersigned as Personal Representative of the Estate of Rattan Kumar Pahala**

a printed copy of which is hereto annexed, was published in the entire issue of said newspaper for 3 time(s) in the following issues:

6/24/2016

7/1/2016

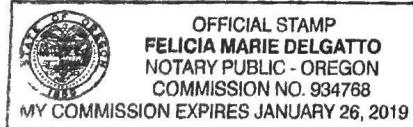
7/8/2016

State of Oregon  
County of Multnomah

SIGNED OR ATTESTED BEFORE ME  
ON THE 8th DAY OF July, 2016

  
\_\_\_\_\_  
Michelle Ropp  
  
\_\_\_\_\_  
Felicia Marie Delgatto

Notary Public-State of Oregon



**ESTATE OF  
RATTAN KUMAR PAHALAD**

CASE NUMBER: 16PB03421

NOTICE TO INTERESTED PERSONS  
Notice: The Circuit Court of the State of Oregon, for the County of Multnomah has appointed the undersigned as Personal Representative of the Estate of Rattan Kumar Pahalad, deceased. All persons having claims against said estate are required to present the same, with proper vouchers to the Personal Representative at the address of her attorney, 312 NW 10th Ave., #200B, Portland OR 97209 within four months from the date of first publication of this notice as stated below, or they may be barred. All persons whose rights may be affected by this proceeding may obtain additional information from the records of the court, the Personal Representative, or the Attorney for the Personal Representative.

Dated and first published June 24, 2016

**PERSONAL  
REPRESENTATIVE**  
Sanjana Pahalad Mancuso  
707 N Hayden Island Drive,  
Unit 423  
Portland, OR 97217

**ATTORNEY FOR PERSONAL REPRESENTATIVE**  
Maret Thatcher Smith  
312 NW 10th Ave #200 B  
971-284-7129  
maret@thatchersmithlaw.com  
OSB # 105103

11098131

Thatcher Smith Law  
312 NW 10th Ave  
Portland, OR 97209-3121

Order No.: 11098131  
Client Reference No: 16PB03421

Exhibit 1  
Page 1 of 1

Exhibit 14  
Page 3 of 4

## **CERTIFICATE OF SERVICE**

I certify that on January 5, 2017, I served or caused to be served a true and complete copy of the foregoing **PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF OPPOSITION TO DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S SECOND CLAIM** on the party or parties listed below as follows:

- Via the Court's Efilng System
- Via First Class Mail, Postage Prepaid
- Via Email
- Via Personal Delivery

10 Maret Thatcher Smith  
11 Thatcher Smith Law  
12 107 SE Washington St. Ste 255  
Portland, OR 97214  
13 Of Attorneys for Defendant

## HARRANG LONG GARY RUDNICK P.C.

By: s/Arden J. Olson  
Arden J. Olson, OSB #870704  
Telephone: 541-485-0220  
Facsimile: 541-686-6564  
Of Attorneys for Plaintiff

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Page 3 – **PLAINTIFF'S REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF  
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